

UNITED STATES DISTRICT COURT

for the

Northern District of Iowa

United States of America

v.

Julius Sullivan

Defendant(s)

Case No. 20-CR-85

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 7, 2020 in the county of Linn in the
Northern District of Iowa, the defendant(s) violated:

Code Section

18 U.S.C. § 751(a)

Offense Description

Escape from Custody

This criminal complaint is based on these facts:

See attached Affidavit.

☒ Continued on the attached sheet.*Complainant's signature*

Nicholas Bonifazi, Deputy United States Marshal

Printed name and title☐ Sworn to before me and signed in my presence.☒ Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone or other reliable electronic means.Date: 10/09/2020*Judge's signature*

Northern District of Iowa

Kelly K.E. Mahoney, Chief United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Nicholas Bonifazi, being first duly sworn on oath, deposes and states the following:

INTRODUCTION AND AGENT BACKGROUND

1. I have been employed with the United States Marshals Service (USMS) since November of 2009. I am a graduate of the Federal Law Enforcement Training Center (FLETC) Criminal Investigator Training Program. I am currently assigned as a Criminal Investigator for the USMS in the Northern District of Iowa. My current duties included conducting fugitive investigations and investigating violations of federal law including, but not limited to, violations of Title 18, United States Code, Section 751(a) (escape from custody).

2. This affidavit is in support of a criminal complaint charging Julius SULLIVAN with a violation of Title 18, United States Code, Section 751(a). The information contained in this affidavit is drawn from information provided by other law enforcement officials, government agencies, the review of documents, as well as my own experience and training. Where statements of others are set forth in this affidavit, they are set forth in substance and not verbatim.

PROBABLE CAUSE

3. On October 25, 2018, SULLIVAN pled guilty to distribution of a controlled substance near a playground in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 860(a) in case number 18-CR-0080 in the United States District Court for the Northern District of Iowa. On April 4, 2019, the Court sentenced SULLIVAN to 30 months' imprisonment in the custody of the Attorney General, specifically the Federal Bureau of Prisons (FBOP), with 6 years of supervised release to follow.

4. On June 4, 2020, FBOP transferred SULLIVAN to the Gerald R. Hinzman Center (the Hinzman Center), a residential reentry center in Cedar Rapids, Iowa. The transfer was for purposes of pre-release planning. SULLIVAN was to serve the remainder of his FBOP sentence at the Gerald Hinzman Center, with a projected release date of December 31, 2020.

5. On October 7, 2020, at approximately 7:00 a.m., while still in the custody of the Attorney General, SULLIVAN signed out of the Hinzman Center on an approved pass. He was due to return at 6:00 p.m. SULLIVAN failed to return and the Hinzman Center placed him on escape status. Hinzman Center personnel notified the USMS of the escaped prisoner.

6. SULLIVAN did not contact the Hinzman Center again. At present, his whereabouts are unknown.


7. Based on the foregoing, my knowledge, training and experience, I respectfully submit that there is probable cause to believe Julius SULLIVAN knowingly escaped from the custody of the Attorney General while being housed by the FBOP at the Hinzman Center on October 7, 2020, in violation of Title 18, United States Code, Section 751(a).

I declare under the penalty of perjury that the foregoing facts and circumstances are true and correct to the best of my knowledge and belief.

Executed this 09 day of October, 2020.


Nicholas Bonifazi
Deputy United States Marshal

Subscribed and sworn to me by phone and other reliable electronic means this 9th day of October, 2020.


Kelly K.E. Mahoney
Chief United States Magistrate Judge
Northern District of Iowa